

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

|                              |   |                           |
|------------------------------|---|---------------------------|
| JESSICA LANGFORD,            | ) |                           |
|                              | ) |                           |
| Plaintiff,                   | ) |                           |
|                              | ) |                           |
| v.                           | ) | Case No. 4:18-cv-2037-CAS |
|                              | ) |                           |
| CITY OF ST. LOUIS, MISSOURI, | ) |                           |
|                              | ) |                           |
| Defendant.                   | ) |                           |

**JOINT PROPOSED SCHEDULE**

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court's Order of January 8, 2019 (Doc. # 7):

**I. Scheduling Plan:**

1. The parties agree that this case is properly assigned to Track 2 Standard.
2. All motions for joinder of additional parties or amendment of the pleadings should be filed no later than March 10, 2019.
3. Discovery shall proceed in the following manner:
  - (a) The parties agree to produce all electronically stored information (ESI) in either Portable Document Format (PDF) or the format maintained (the Native Format). If the party receiving the information does not have the capability to read the ESI in Native Format, the parties agree that the producing party will either provide access to software capable of reading such ESI or to produce such ESI in PDF format or another format agreed upon in writing by the parties.

- (b) The parties agree that, pursuant to Federal Rule of Evidence 502(d), inadvertent production of any documents in this proceeding shall not, for purposes of this proceeding or any other proceeding in any other court, constitute, on its own, a waiver of any attorney-client privilege or attorney work product applicable to those documents.
- (c) The parties shall make all disclosures required by Fed. R. Civ. P. 26(a)(1) and including disclosure of locations and format of all discoverable electronically stored information (ESI) no later than February 15, 2019.
- (d) The parties agree that the presumptive limits of ten (10) depositions per side as set forth in Rule 30(a)(2)(A), Fed. R. Civ. P., and twenty-five (25) interrogatories per party as set forth in Rule 33(a), Fed. R. Civ. P., should apply in this case.
- (e) Discovery shall not be conducted in phases or limited to certain issues.
- (f) The parties will not call expert witnesses.
- (g) The parties do not anticipate that physical or mental examinations will be requested.
- (h) The parties shall complete all discovery in this case no later than July 26, 2019.

4. The parties believe that formal mediation is not necessary in this case.

5. Any dispositive motions must be filed no later than August 30, 2019.

Responses to dispositive and motions will be due within 30 days of filing the motion. Replies to dispositive and motions for summary judgment will be due within 10 days of filing the response.

II. Trial. The parties submit that this case will be ready for trial on or after December 9, 2019. It is anticipated that the length of time to try the case is approximately three days.

Respectfully submitted,

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